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REPLY TO EM-453 (A. Rampertaap, 3-8191)

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Rocky Flat Responses to Regulator and Department of Energy Comments on the SUBJECT: Final Phase I Resource Conservation and Recovery Act Facility Investigation/Remedial Investigation Work Plan for Operable Unit 9

TO: Frazer Lockhart, Rocky Flats Office

The Office of Southwestern Area Programs, Rocky Flats/Albuquerque Production Division (EM-453) has analyzed the responses by Rocky Flats (RF) to comments made by Environmental Protection Agency, Colorado Department of Health and Department of Energy (DOE) on the subject document. Generally, we are concerned about the lack of integration in sampling efforts for Operable Unit (OU) 9 (Original Process Waste Lines) with other OUs, as indicated by RF responses. In responsibly managing its Environmental Restoration program, DOE should minimize duplicative sampling efforts.

In addition, we note from RF's responses that the Environmental Evaluation (EE) for OU 9 may be completely rewritten. Given that RF's response to many comments on the original EE was that insufficient time prevented incorporating those comments, this rewrite may be the opportunity to address these points. EM-453 would like to review the EE Work Plan for the concerns expressed in this analysis before it is sent to the regulators.

If you have any questions regarding this analysis, please contact me at FTS 301-903-8191.

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Autar Rampertaap Rocky Flats/Albuquerque Production Division Office of Southwestern Area Programs Environmental Restoration

Attachment

cc w/o attachment:

R. Greenberg, EM-453

J. Hartman, RF

B. Magee, HAZWRAP

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